

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Law School Admission Council, Inc.	:	CIVIL ACTION
	:	
v.	:	
	:	
Morley Tatro, d/b/a Cambridge LSAT	:	NO. 2:15-cv-05219-MAK

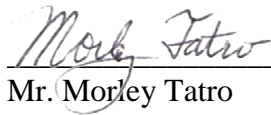
AFFIDAVIT OF MORLEY TATRO

1. I am over the age of 18 years, have personal knowledge of the matters stated below, and am competent to testify to these matters.
2. I am a resident of Burbank, California.
3. I am the sole owner of Cambridge LSAT, which has its office in southern California.
4. Cambridge LSAT is a dba of Morley Tatro, and is not an incorporated entity.
5. Cambridge LSAT materials are published on the Internet and are available to anyone who wishes to access the website or the third party vendors, like Amazon and CreateSpace, that may offer the content for sale via their own platforms. Cambridge LSAT regularly receives Internet traffic from all over the world.
6. The content on the Cambridge LSAT website is presented in exactly the same fashion to any Internet visitor, regardless of that visitor's physical location. For example, if a visitor from France accessed Cambridge LSAT with their web browser, that visitor would be presented with the identical content as an Internet visitor from Virginia, California, Montana, Pennsylvania, or Texas.
7. The Cambridge LSAT website is published to a web server and offers the identical content and user experience to anyone that may seek to access the website. The website is not "more" or "less" available to any one Internet visitor compared to any other Internet visitor.
8. I have never personally been to Pennsylvania.

9. Cambridge LSAT does not directly advertise in Pennsylvania.
10. Cambridge LSAT does not contract to supply services or goods in Pennsylvania.
11. Cambridge LSAT has never caused tortious injury by an act or omission in the Commonwealth of Pennsylvania. Even if I were liable for any copyright infringement, which I deny, my infringement would have occurred in California.
12. Cambridge LSAT does not solicit business, engage in any other persistent course of conduct, or derive substantial revenue in Pennsylvania.
13. The United States District Court for the Eastern District of Pennsylvania is approximately 2,700 miles away from Cambridge LSAT's home office, located in southern California.

* * *

I declare and certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 2, 2015.



Mr. Morley Tatro